



U.S. Department of Justice

*United States Attorney
Southern District of New York*

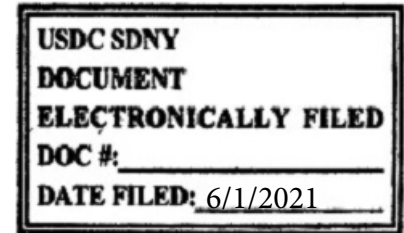
*86 Chambers Street, 3rd floor
New York, NY 10007*

May 28, 2021

MEMO ENDORSED

BY ECF

Honorable Barbara C. Moses
United States Magistrate Judge
United States District Court
500 Pearl Street
New York, New York 10007



Re: Wilson Granger v. Comm'r of Soc. Sec.
20 Civ. 10023 (BCM)

Dear Judge Moses:

Pursuant to the Court's April 1, 2021 order in this Social Security case, the administrative record is due to be filed by June 1, 2021. We write respectfully to request, with the consent of plaintiff's counsel, that the time for filing the record be adjourned for 30 days, until July 1, 2021. As set forth in the enclosed declaration of Lesha Cowell, sworn to May 28, 2021, the reason for this request is that the teleworking and other temporary workplace changes that started in March 2020 due to the COVID-19 pandemic continue to significantly impact the operations of the Social Security Administration's ("SSA's") Office of Appellate Operations, and affect its ability to prepare administrative records.

In making this request we recognize that the Court's April 1, 2021 order stated that no further extensions of the deadline to file the record would be granted absent compelling circumstances. We regret the necessity of requesting a second extension to file the record, after the Court granted a first request, but we submit that compelling circumstances for the extension exist here. Despite its best efforts, SSA has been unable to prepare administrative records in the time frame set by the court due to the effects of the pandemic, and a dramatic increase in Social Security court case filings. However, as the Cowell declaration demonstrates, SSA has made significant strides in reducing the backlog of records to be prepared, and is continuing to work toward increasing productivity and its capacity to transcribe hearing tapes.

We appreciate the Court's consideration of this request.

Respectfully,

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United States Attorney

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Enc.

cc: Charles E. Binder, Esq.

Application GRANTED. No further extensions
will be granted. SO ORDERED.



Barbara Moses
United States Magistrate Judge
June 1, 2021